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8 SIGNATURE HEALTHCARE SERVICES, LLC

9 AND AURORA LAS ENCINAS, LLC

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

12 UNITED STATES OF AMERICA and the

13 STATE OF CALIFORNIA, *ex rel.*,

14 SHELBY EIDSON,

15 Plaintiffs,

16 vs.

17 AURORA LAS ENCINAS, LLC, LINDA

18 PARKS, SIGNATURE HEALTHCARE

19 SERVICES, LLC, AND DOES 1

20 THROUGH 10, jointly and severally,

21 Defendants.

Case No.: 2:10-cv-1031 JAK (RZ)

(Hon. Ralph Zarefsky)

**DEFENDANTS AURORA LAS  
ENCINAS, LLC AND SIGNATURE  
HEALTHCARE SERVICES LLC'S  
NOTICE OF EMERGENCY  
MOTION AND EMERGENCY  
MOTION FOR STAY OF THE  
8/28/2012 FINAL ORDER ON  
PLAINTIFF'S MOTION TO  
COMPEL**

**DATE: 9/17/2012**

**TIME: 10:00 AM**

**COURTROOM: 540**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE THAT, on September 17, 2012 commencing at 10:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 540 of the United States District Court for the Central District of California, located at 255 E. Temple Street, Los Angeles, California, 90012, the Honorable Ralph Zarefsky presiding, Defendants AURORA LAS ENCINAS, LLC and SIGNATURE HEALTHCARE SERVICES, LLC will, and hereby does, move this Court for an order staying the Final Order on Plaintiff's Motion to Compel dated August 28, 2012, insofar as the Defendants are appealing this decision to District Judge John A. Kronstadt and the substantial legal issues would become moot if Defendants were required to comply with the August 28, 2012 Final Order and produce documents within 30 days.

This motion is made pursuant to Fed.R.Civ.P. 72(a), Local Rule 72-2.1, Federal Rule of Appellate Procedure 8, and is based on this Notice of Emergency Motion, the attached Memorandum of Points and Authorities, the complete court file in this case, and on such other and further evidence and argument that may be presented at the time of hearing.

This motion is made following a conference of counsel pursuant to Local Rule 7-3 which took place on September 7, 2012.

Respectfully submitted,

Dated: September 10, 2012

THE HEALTH LAW PARTNERS, P.C.

By: /s/ Alan G. Gilchrist

Alan G. Gilchrist

1 Dated: September 10, 2012

LAW OFFICE OF DEBRA A. SPICER, P.C.

2 By: /s/Debra A. Spicer

3 Debra A. Spicer

4 Attorneys for Defendants

5 AURORA LAS ENCINAS, LLC, and

6 SIGNATURE HEALTHCARE SERVICES, LLC

**PROOF OF SERVICE**

**STATE OF MICHIGAN, COUNTY OF OAKLAND**

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Oakland, State of Michigan. My business address is 29566 Northwestern Highway, Suite 200, Southfield, Michigan, 48034.

On September 10, 2012, I served true copies of the following document(s) described as **DEFENDANTS AURORA LAS ENCINAS, LLC AND SIGNATURE HEALTHCARE SERVICES, LLC'S NOTICE OF EMERGENCY MOTION AND EMERGENCY MOTION FOR STAY OF THE 8/28/2012 FINAL ORDER ON PLAINTIFF'S MOTION TO COMPEL** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with The Health Law Partners, P.C.'s practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

**CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on September 10, 2012, at Southfield, Michigan.

/s/Marianna M. McIntyre  
Marianna M. McIntyre

**SERVICE LIST**  
**UNITED STATES OF AMERICA, *ex rel.*, SHELBY EIDSON vs.**  
**AURORA LAS ENCINAS, LLC, *et al.***  
**Case No. 2:10-cv-1031 JAK (RZx)**

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*Via CM/ECF*